PROPERTY REVIEW CONTAINER-CARE INTERNATIONAL, INC. PORT OF SEATTLE – TERMINAL 106W/TERMINAL 108

1.0 Background Information

Facility Name and Address

Container-Care International, Inc. 1 S. Idaho Street Seattle, WA 98134

Facility Owner/Operator

Container-Care International, Inc. 1 S. Idaho Street Seattle, WA 98134

Property Owner

Port of Seattle P.O. Box 1209 Seattle, WA 98111

Current Use of Site

Container-Care International, Inc. (CCI) stores, reconditions, and refurbishes shipping containers including refrigerated units. CCI has been operating at this site since July 1990 (Ecology 1992c). Specific activities at the site include: marine cargo container structural repair (no sandblasting); container chassis repair and painting; repair of refrigeration equipment on refrigerated containers, pressure washing of marine cargo containers, container/chassis storage, and transportation services (CCI 1993).

Past Use of Site

The site was previously leased by Coastal Trailer Repairs, Inc. (Coastal Container Services 1994). No other information on past use of the site was available.

Size of Site

CCI initially leased 12 acres of land from the Port of Seattle at Terminal 106W. In 1993, they reportedly entered an agreement with the Port of Seattle to lease an additional 15 acres of land at Terminal 108, south of and adjacent to the Terminal 106W property (CCI 1993b).

Site Security

No information about site security was available. Based on inspection photos, the site appears to be surrounded by a chain link fence (Ecology 2001).

Adjacent Land Use

Adjacent land use is industrial. The site is bounded by the Duwamish River on the west, Ash Grove Cement and Transportation Services CFS to the north, unknown industrial property on the south, and the Washington State Liquor Control Board warehouse on the east.

2.0 Site Map

The site location is shown on Figure 1. The north side of the site is used for container storage, painting, and refurbishing. Vehicle maintenance is conducted on the south side, and the central area contains the wash pad, refrigeration service activities, and paint shed (Ecology 2001).

3.0 Chemical/Waste Handling Information

Chemicals Used/Stored at the Site

The following chemicals have reportedly been used at the site (chemicals identified with an "*" are believed to be currently used):

diesel fuel*	soda ash
Zep degreaser (aerosol)*	kerosene
DM-7 (aerosol)*	paint thinner*
paint*	Freon 12
hydraulic fluid*	parts cleaning solvent
polymer for cleaning*	sodium hypochlorite*
KC1000 Cleaner (polyethylene	
nonylphenol, glycol ether)	

Waste Products Generated or Stored at the Site

Wastes are produced at the site from painting, forklift maintenance, parts washing, and cleaning activities. The facility's first hazardous waste compliance inspection was conducted in August 2001 (Ecology 2001). During this and other inspections (Ecology 1993, Ecology 1999), the following wastes were identified:

le control de la	
Waste oil (sometimes with	Waste paint thinner (toluene)
1,1,1-TCA, halogenated	
compounds)	
Used hydraulic fluid	Parts washer solvent (Breakthrough)
Used antifreeze	Used batteries
Waste oil filters with	Used and partially-used aerosol cans
halogenated compounds and	(hexane, TCE, degreaser)
benzene	_
Steam cleaning washwater	Sludge from wastewater treatment system
Oily rags and shop towels	Acetone
Waste paint	Ethyl acetate
Methyl isobutyl ketone	Methanol
(MIBK)	
Scrap metal and wood	Toluene/xylene

Volumes of Chemicals Used and Wastes Generated Per Year; Maximum On Site

Since it began operations at this location in 1990, CCI has significantly reduced the volume of chemicals used and wastes generated.

In 1992, CCI generated 12,110 pounds of dangerous waste, of which 6,125 pounds was identified as a remedial or one-time waste (waste oil with halogenated compounds) (CCI 1993). In that year, CCI complete 5,200 container washouts and used the following quantities of chemicals (CCI 1993):

paint	600 gallons
thinner	600 gallons (2,992 pounds)
freon	1,560 pounds
parts cleaner	1,728 14-oz. cans

In 1994, CCI implemented a non-hazardous parts washer, began using high solids paint, non-hazardous gun cleaners, and rollers and brushes for most container repairs, rather than spray.

In 1995, CCI produced 6,728 pounds of manifested waste. Of this total, 5,146 pounds was waste paint and thinner (of which 54% was recycled). In addition, 1,485 pounds of waste oils contaminated with isopropyl alcohol were produced (CCI 1996).

Also in 1995, CCI reduced water usage from about 500-700 gallons per day to about 10 gallons per six-month period (Ecology 1995) by installing a wastewater treatment system. Waste sludge (about one cubic yard per month) is disposed of as a non-hazardous solid waste.

In 1997, the facility generated 3,300 pounds of waste paint-related material (waste codes D001, F003, F005), of which 59% was recycled (CCI 1998).

According to CCI's Dangerous Waste Generation and Management Form for 1998, the facility generated 1,237 pounds of waste paint-related material (waste codes D001, F003, and F005) in that year, of which 57% was recycled.

In 1999, Ecology indicated that "CCI has significantly reduced all waste streams so that according to pollution prevention standards they are considered below planning thresholds due to recycling credits" (Ecology 1999a, 1999b).

Chemical or Waste Treatment Systems

In 1996, CCI won a Governor's Award for Pollution Prevention for installing a water recirculating system for steam cleaning the containers. The system consists of a series of four long french drains placed parallel in the yard area. The cleaning water enters the drains and is filtered and recirculated into the steam cleaning machine, and then reused.

Water is pumped to batch tank, where polymer and chlorine are added. The mixture is allowed to settle before the supernatent is filtered (50 micron bag filter) and reused in the cleaning cycle.

Sludge is allowed to settle and thicken. Thickened sludge is pumped to solar drying beds before disposal. It takes about 4 to 6 months to fill a 55-gallon container (which is sent to Northwest Enviro Service when full).

Chemical/Waste Storage or Disposal Areas

The most recent facility inspection for which information was available (Ecology 2002) described the following chemical/waste storage areas:

- used oil and antifreeze are stored in the west part of the chassis service area, on secondary containment pallets
- a satellite storage area contained a 55-gallon drum of aerosol cans

A 2001 Ecology site inspection observed an unmanaged waste storage pile (containing empty freon containers, scrap metal, and wood) in the central west portion of the site (the refrigeration service area). An aboveground fuel storage tank was observed with no lid; it contained fuel and possibly rainwater. Paint products (toluene) and new paint were stored inside a flammable storage container. In general, poor housekeeping was observed (Ecology 2001).

During earlier inspections, an outdoor oil storage area was observed; it contained 55-gallon drums used for storage of hub oil, coolant, oil filters, and sludge.

Wastes Removed From the Site

Inland Technologies serviced the parts washer solvent (Breakthrough) in 2001 (Ecology 2002). Safety Kleen serviced the parts washer solvent in 1999 (Ecology 2001).

A 1993 site visit report (Ecology 1993b) identified Northwest Enviro Services as the TSD. Used oil and antifreeze were reportedly removed.

Spills or Releases

On March 12, 1991, a complaint was filed with the Department of Ecology regarding the CCI facility. The caller indicated that CCI was painting four to 10 shipping containers per day with no containment area, and that wastewater with paint was going to a pipe at the south end of the site, and then directly to the Duwamish River. Tom Hudson from the Puget Sound Air Pollution Control Authority (PSAPCA) investigated the complaint and did not observe any evidence for the basis of the complaint.

On April 15, 1992, another complaint was filed with the Department of Ecology. An anonymous caller reported that there was oil or transmission fluid oozing out of the ground near the Duwamish River. During a subsequent Ecology inspection (Ecology 1992c), considerable turbidity was observed at the location where the facility storm drain outfall discharges into the Duwamish River. No oil sheen was observed. Subsequent correspondence between Ecology and CCI (Ecology 1992d, CCI 1992) discussed the potential contribution of dust control/surface runoff from unpaved surfaces on the site to the turbidity problem observed at the outfall.

Another complaint (date not readable) was received by Metro indicating that the NW Container Services is hosing down a barge with degreaser, and also sandblasting.

The City of Seattle has reportedly received a few complaints concerning oil sheen and a white substance, possibly water-soluble acrylic resin, discharging from the City of Seattle stormwater outfall that enters the Duwamish River adjacent to the CCI facility (Ecology 2001).

During a 2001 Ecology compliance inspection, spills of waste oil (several gallons) were observed at the site (Ecology 2001).

No other reports of spills or releases were identified in the documents reviewed.

Hazardous Substances Used, Stored, or Released by Prior Owners/Operators

No information on hazardous substances used, stored, or released by prior owners/operators was available.

4.0 Permit Information

File documents list the following permits for CCI:

- National Pollutant Discharge Elimination System (NPDES) Permit No. S03-001581
- Seattle Master Use Permit (MUP) No. 9305156
- Puget Sound Air Pollution Control Agency Permit No. 10438

5.0 Sampling/Cleanup Information

File documents indicate that no environmental sampling has been conducted at this site. A representative grab sample of wastewater treatment sludge (from another CCI facility that employes a similar wastewater treatment system) was analyzed and contained the following: 2,840 ppm oil & grease, and the following TCLP inorganics: barium at 4.43 mg/L, lead at 0.76 mg/L, nickel at 0.15 mg/L, selenium at 0.14 mg/L, and zinc at 3.87 mg/L. No TCLP organics were detected in the sample.

References

Coastal Container Services. 1994. Letter from Mark Navarre, Coastal Container Services, to Norm Peck, Washington Department of Ecology, Re: Removal of Coastal Trailer Repair, Inc from Confirmed and Suspected Site Report. September 21, 1994.

CCI (Container-Care International, Inc.). 1992. Letter from Michael J. Harr, Container-Care International, Inc. to Ms. Joanne Polayes-Wien, Department of Ecology, Re: Letter of October 26, 1992. November 3, 1992.

CCI. 1993. Letter from Bob Bunch, Container-Care Seattle, to Ms. Alice North, Department of Ecology, Re: Submittal of the Executive Summary of the Pollution Prevention Plan for Container-Care International, Inc.'s Seattle Depot at Terminal 106W/108. September 1, 1993.

CCI. 1993b. Letter from Michael J. Harr, Container-Care International, to Ms. Joanne Polayes-Wien, Department of Ecology, Re: Property in Port of Seattle Terminals 106W and 108-Port of Seattle and Container-Care International, Inc. (CCI). March 11, 1993.

CCI. 1995. Pollution Prevention Opportunity Status, Worksheet 1. Received by Washington Department of Ecology on 8/28/95.

CCI. 1996. Pollution Prevention Opportunity Status, Worksheet 1. Received by Washington Department of Ecology on 8/15/96.

CCI. 1997. Pollution Prevention Opportunity Status, Worksheet 1. Received by Washington Department of Ecology on 9/8/97.

CCI. 1998. Pollution Prevention Opportunity Status, Worksheet 1. Received by Washington Department of Ecology on 9/17/98.

Dangerous Waste Annual Report Verification Form. 1997. Submitted to Washington Department of Ecology by Container Care Seattle.

Dangerous Waste Annual Report Verification Form. 1998. Submitted to Washington Department of Ecology by Container Care Seattle.

Ecology (Washington Department of Ecology). 1992a. ERT System -- Initial Report/Follow-On. N8063. March 12, 1992.

Ecology. 1992b. ERT System -- Initial Report/Follow-On. N8468. April 15, 1992.

Ecology. 1992c. Department of Ecology, Inspection Report. Prepared by J. Polayes-Wien/K. Miller. June 24, 1992.

Ecology. 1992d. Letter from Joanne Polayes-Wien, Department of Ecology, to Mr. Bob Bunch, Container Care Interantional Inc. Re: Follow-Up on Ecology's Inspection. October 26, 1992.

Ecology. 1993. Waste Reduction, Recycling, and Litter Control Program, Site Visit or Contact Report. April 6, 1993.

Ecology. Date not readable. ERT System – Initial Report/Follow-On.

Ecology. 1995. Site Visit/Meeting Report, Hazardous Waste and Toxic Reduction Program. Container-Care – Seattle. October 24, 1995.

Ecology. 1999a. Site Visit/Meeting Report, Hazardous Waste and Toxic Reduction Program. Container-Care – Seattle. April 5, 1999.

Ecology. 1999b. Letter from Holly Sullivan, Information Specialist, Department of Ecology to Steve Johnson, Envir. Director, Container Care Corp. Re: No Longer Required to Submit Pollution Prevention Documents. April 6, 1999.

Ecology. 2001. Washington Department of Ecology, Hazardous Waste & Toxics Reduction Program, Compliance Report. August 14, 2001.

Ecology. 2002. Washington Department of Ecology, Hazardous Waste & Toxics Reduction Program, Compliance Report. January 10, 2002.

Metro. 1994. Letter from Cynthia H. Wellner, Industrial Waste Investigator, King County Department of Metropolitan Services, to Doug Knutson, Department of Ecology, Re: Permit Application for Container Care International. July 18, 1994.